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Experian Information Solutions, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANDY. MENDOZA,

Plaintiff,

v.

PLUSFOUR, INC; QUANTUM
COLLECTIONS; CREDIT COLLECTION
SERVICES; CARRINGTON MORTGAGE
SERVICES, LLC; EQUIFAX
INFORMATION SERVICES, LLC,

Defendants.

BRENDA B. MENDOZA,

Plaintiff,

v.

ALLIED COLLECTION SERVICES, INC;
QUANTUM COLLECTIONS;
CARRINGTON MORTGAGE SERVICES,
LLC; SELENE FINANCE LP; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION
SOLUTIONS, INC; INNOVIS DATA
SOLUTIONS, IN

Defendants.

Lead Case No. 2:16-cv-01916-JAD-CWH

[Member Case No. 2:16-cv-01921-JCM-NJK]

**NOTICE OF STIPULATION AND ORDER
TO EXTEND DISCOVERY DEADLINES**

[First Request]

Please take notice that on December 19, 2016, the Court entered a Stipulation and Order to Extend Discovery Deadlines [First Request] (“Stipulation and Order”) in the member case of *Brenda Mendoza v. Allied Collection Services, Inc. et al.*, Case No. 2:16-cv-01921-JCM-NJK (the “Member Case”). A copy of that Stipulation and Order is attached hereto as Exhibit 1 for the Court’s convenience. Thereafter, on December 22, 2016, the Court granted a Motion to Consolidate, consolidating the Member Case into the instant matter (ECF No. 17), and the parties hereby agree and respectfully request that the Stipulation and Order govern the discovery deadlines in this consolidated matter.

Dated: January 19, 2017

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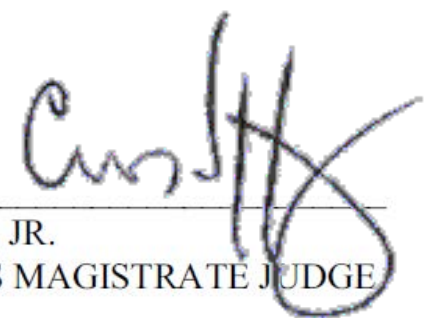
WOLFE & WYMAN LLP

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Attorneys for Carrington Mortgage Svcs, LLC

IT IS SO ORDERED.

DATED: 1/20/17


C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

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Experian Information Solutions, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRENDA B. MENDOZA,

Plaintiff,

v.

ALLIED COLLECTION SERVICES, INC;
QUANTUM COLLECTIONS;
CARRINGTON MORTGAGE SERVICES,
LLC; SELENE FINANCE LP; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION
SOLUTIONS, INC; INNOVIS DATA
SOLUTIONS, IN

Defendants.

Case No. 2:16-cv-01921-JCM-NJK

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

[First Request]

Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case thirty (30) days, up to and including April 6, 2017. In addition, the parties request that the dispositive motions and pretrial order deadlines be extended for an additional thirty (30) days, as outlined herein. In support of this Stipulation and Request, the parties state as follows:

I. DISCOVERY COMPLETED TO DATE

1. Plaintiff filed the instant complaint on August 12, 2016.
2. Presently, the only active parties to this case are Plaintiff, Experian Information Solutions, Inc. (“Experian”), Carrington Mortgage Services, LLC (“Carrington”). As such, the

1 recitation of discovery completed is only as to Plaintiff, Experian and Carrington.

2 3. On September 8, 2016, Experian filed its answer.

3 4. On September 23, 2016, Carrington filed its answer.

4 5. On October 5, 2016, the Discovery Plan and Scheduling Order was entered.

5 6. On October 10, 2016, Plaintiff served her initial disclosures.

6 7. On October 17, 2016, Experian served its initial disclosures.

7 8. On October 20, 2016, Plaintiff served Experian with interrogatories and requests
8 for production of documents.

9 9. On October 27, 2016, Plaintiff served Experian with supplemental requests for
10 production of documents.

11 10. On November 5, 2016, Plaintiff noticed Experian's deposition for January 17, 2017.
12 Experian is unavailable on January 17, 2017, but is available March 1, 2017. Plaintiff has agreed
13 to renote Experian's deposition for March 1, 2017.

14 11. On November 9, 2016, Plaintiff served Experian with requests for admission.

15 12. On November 16, 2016, Plaintiff served Carrington with requests for production
16 and interrogatories.

17 13. On November 22, 2016, Experian served its responses to the requests for
18 production of documents and interrogatories. With these responses, Experian produced Plaintiff's
19 non-confidential credit file and stated it would produce the confidential portion of the Plaintiff's
20 credit file upon entry of an appropriate protective order.

21 14. On November 29, 2016, Experian responded to Plaintiff's supplemental requests
22 for production.

23 15. On December 12, 2016, Experian responded to Plaintiff's first requests for
24 admissions.

25 **B. Specific Description of Discovery that Remains to be Completed**

26 1. The deposition of Plaintiff, which Experian has agreed to notice for after Experian's
27 deposition;

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1 2. The deposition of Experian's 30(b)(6) witness, which Plaintiff has agreed to
2 renotice for March 1, 2017;

3 3. Depositions of any remaining parties and witnesses;

4 4. Circulation, submission, and court approval of a stipulated protective order;

5 5. Document productions; and,

6 6. Any necessary additional written discovery.

7 **C. Reasons Why the Remaining Discovery Was Not Completed**

8 The parties aver, pursuant to LR 6-1, that good cause exists for the requested extension.
9 At this juncture, the discovery close is March 7, 2017. The parties have worked in good faith to
10 resolve any issues with respect to the noticing of Experian's 30(b)(6) deposition and Plaintiff's
11 deposition. Plaintiff has agreed to renotice Experian's 30(b)(6) deposition for March 1, 2017, as
12 this witness is unavailable on January 17, 2017. The parties have agreed to this date in light of
13 Experian's witness's availability and the scheduling of Experian's 30(b)(6) witness' deposition in
14 other matters with Plaintiff's counsel that have earlier discovery closes. Further, Experian will be
15 circulating a proposed stipulated protective order within the next two weeks, and then will produce
16 its confidential documents withheld upon entry of the protective order.

17 While the discovery close is currently March 7, 2017, the parties respectfully request a
18 short 30-day extension at this time to allow for sufficient time for renoticing Plaintiff's deposition
19 after Experian's deposition (March 1, 2017), any additional third-party depositions and/or motion
20 practice that may be necessary after party depositions. While the parties will work in good faith
21 to resolve any discovery disputes without the need for motion practice, the extension will permit
22 time for such motion practice, if necessary.

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D. Proposed Discovery Deadlines

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Close of Discovery	March 7, 2017	April 6, 2017
Dispositive Motions	April 6, 2017	May 8, 2017
Pre-Trial Order	May 8, 2017	June 7, 2017

IT IS SO STIPULATED.

Dated: December 16, 2016

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*Attorneys for Carrington Mortgage Svcs, LLC***ORDER****IT IS SO ORDERED.**

Dated: _December 19, 2016


 UNITED STATES MAGISTRATE JUDGE